## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

HAROLD J. HEIN REVOCABLE TRUST; RICHARD HEIN, in his capacity as successor trustee of the Harold J. Hein Revocable Trust; and ROBERT HEIN, in his capacity as successor trustee of the Harold J. Hein Revocable Trust.

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04861 (SMB)

## STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation ("Stipulation") is submitted pursuant to the Bankruptcy Court's Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order ("Case Management Procedures Order").

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is

extended up to and including January 31, 2018.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this

matter through the mediation process as contemplated under the Case Management Procedures

Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and

defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such

rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of

which when so signed shall be an original, but all of which shall together constitute one and the

same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be

deemed an original.

Dated: November 20, 2017

New York, New York

/s/

Baker & Hostetler LLP

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Dean D. Hunt

Email: dhunt@bakerlaw.com

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

<u>/s/</u>

DENTONS US LLP 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 768-6700

Facsimile: (212) 768-6800

Carole Neville

Email: carole.neville@dentons.com

Attorneys for Defendants

<u>/s/</u>

Stradley Ronon Stevens & Young, LLP 100 Park Avenue, Suite 2000 New York, NY 10017 Telephone: (212) 812.4138

Telephone: (212) 812.4138 Facsimile: (646) 682.7180 Deborah A. Reperowitz

Email: dreperowitz@stradley.com

Mediator